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Attorney for Defendant
Manuel Gonzalez Chavez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR - 15-547-2 JD
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
v.)	ORDER CONTINUING SENTENCING
)	DATE
MANUEL GONZALEZ CHAVEZ)	
)	
Defendant.)	

STIPULATION

The United States of America and defendant Manuel Gonzalez Chavez, by and through their respective counsel, with the agreement of U.S. Probation Officer Joan Vasquez, hereby stipulate and ask the court to find as follows:

1. The defendant is currently scheduled for sentencing on October 24, 2018.
2. Defendant Chavez is facing a mandatory minimum sentence of 25 years. The government is expected to recommend a sentence greater than 25 years.
3. The Probation Officer who was preparing the final Presentence Report Defense left the U.S. Probation office for another job on or about October 1, 2018. On October 2, 2019 that probation officer was replaced by USPO Joan Vasquez. The parties and U.S. Probation agree that more time is needed for U.S. probation to complete the final Presentence report.

1 Additionally, counsel for defendant has yet to receive the defendant's medical records from the
2 Glen Dyer Facility. All of the parties agree that the final Presentence report and defendant's
3 sentencing investigation will be completed in time for a new sentencing date of November 14,
4 2018.

5 4. Based on the foregoing the parties request that the court vacate the current sentencing date
6 and set a new sentencing date of November 14,2018 at 10:30 a.m.

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9 Dated: October 3, 2018

Respectfully submitted,

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12 /s/
ALAN A. DRESSLER
Attorney for Defendant
Manuel Gonzalez Chavez

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15 /s/
CHRISTIAAN HIGHSMITH
Assistant United States Attorney
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6 [PROPOSED ORDER]
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8 FOR GOOD CAUSE, and pursuant to the stipulation of the government and defendant
9 Manuel Chavez Gonzalez, and the agreement of United States Probation, IT IS HEREBY
10 ORDERED that the sentencing date currently scheduled for October 24, 2018 is vacated and
11 reset for November 14, 2018 at 10:30 a.m.

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13 IT IS SO ORDERED.
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16 Dated: October 3, 2018

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18 HONORABLE JAMES DONATO
19 UNITED STATES DISTRICT JUDGE
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